

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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GEORGE ASSAD, Derivatively on )  
Behalf of FIBROGEN, INC., )  
Plaintiff, )  
v. )  
ENRIQUE CONTERNO, PAT )  
COTRONEO, CHRISTINE CHUNG, )  
MARK EISNER, JAMES A. )  
SCHOENECK, K. PEONY YU, )  
SUZANNE BLAUG, AOIFE ) Case No. 1:21-cv-01811-RGA  
BRENNAN, BENJAMIN F. )  
CRAVATT, JEFFREY L. )  
EDWARDS, JEFFREY W. )  
HENDERSON, MAYKIN HO, )  
THOMAS F. KEARNS JR., GERALD )  
LEMA, RORY B. RIGGS, and )  
KALEVI KURKIJÄRVI, )  
Individual Defendants, )  
-and- )  
FIBROGEN, INC., a Delaware )  
corporation, )  
Nominal Defendant. )

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**STIPULATION AND [PROPOSED] ORDER OF  
VOLUNTARY DISMISSAL WITHOUT PREJUDICE  
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff George Assad (“Plaintiff”), Individual Defendants Enrique Contero, Pat Cotroneo,

Christine Chung, Mark Eisner, James A. Schoeneck, the Estate of Thomas B. Neff, K. Peony Yu, Suzanne Blaug, Aoife Brennan, Benjamin F. Cravatt, Jeffrey L. Edwards, Jeffrey W. Henderson, Maykin Ho, Thomas F. Kearns Jr., Gerald Lema, Rory B. Riggs, and Kalevi Kurkijärvi (“Individual Defendants”), and Nominal Defendant Fibrogen, Inc. (“FibroGen”) (collectively, “Defendants” and, with the Plaintiff, the “Parties”) hereby stipulate that this action be dismissed without prejudice as to all claims and causes of action, with each party bearing that party’s own attorney’s fees and costs.

Notice to shareholders of this stipulation of voluntary dismissal is not required under Federal Rule of Civil Procedure 23.1(c) because the dismissal is without prejudice and no compensation in any form has passed directly or indirectly from any of the Defendants to the Plaintiff or Plaintiff’s attorneys and no promise to give any such compensation has been made.

Dated: November 14, 2024

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IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2024.

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HON. RICHARD G. ANDREWS  
UNITED STATES DISTRICT JUDGE